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MATTHEW W. KING

February 7, 2006

VIA ELECTRONIC FILING

The Honorable Joseph J. Farnan, Jr.
United States District Court
for the District of Delaware
Federal Building
844 North King Street
Wilmington, Delaware 19801

Re: L.G. Philips LCD Co. Ltd. v. Tatung Company et. al.
Civil Action No. 05-292 (JJF)

Dear Judge Farnan:

Defendants seek the Court's guidance at the Discovery Conference set for Wednesday, February 8, 2006 with respect to the following discovery issues. These issues could not be resolved between the parties after two meet and confer telephone conferences between counsel.

1. Production of Documents

In the Court's Scheduling Order, the Court set February 3, 2006 as the date for exchange of all documents. Plaintiff has not completed production of their responsive documents. To date, Defendants have received merely 1/3 box of responsive documents. Plaintiff has represented that more Korean language documents will be produced, but have not given Defendants a date when that production will take place.

Thus, as of this date, Plaintiff has failed to produce, at least, the following categories of responsive documents:

1. Financial documents supporting its damages theory of lost profits and/or reasonable royalty.
2. Research and development documents leading up to the conception and reduction to practice of the subject matter disclosed in the '121 patent. (Nos. 12, 3, 14, 15, 16, 22).

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3. Documents reflecting the first sale or offer to sell a product incorporating the subject matter disclosed or claimed in the '121 patent. (Nos. 10, 11, 20, 29, 30, 31).
4. Documents supporting the data test set out in Table 1 disclosed in the '121 patent. (No. 78)
5. Other unknown categories to be determined once document production is complete.

2. Answer to Interrogatories

Plaintiff has failed to fully answer, at least, the following categories of interrogatories:

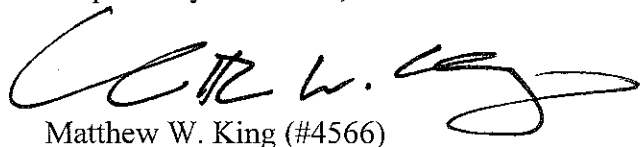
1. Bases of infringement claim elements. (Nos. 16 and 17)
2. Identification of CPT and non-"CPT" LCD displays/monitors allegedly accused of infringing. (Nos. 21 and 28)
3. Identification of Plaintiff's theory of damages, either lost profits or reasonable royalties and related information. (Nos. 13, 14, 29)
4. Identification of public disclosures or sales by LPL of the subject matter of the '121 patent prior to March 23, 2000. (Nos. 2, 18)

3. Depositions

1. Until Plaintiff completes their production of documents, all depositions should be put on hold.
2. Plaintiff's improper 30(b)(6) deposition topics regarding the parties litigation contentions. (Nos. 7, 8, 9)
3. Plaintiff's improper objection to Defendants' 30(b)(6) deposition topics. (Nos. 1, 2, 3, 4, 8)

Thus, Defendants request the Court's guidance in resolving the above disputes.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Matthew W. King", with a stylized flourish at the end.

Matthew W. King (#4566)

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MXK

cc: Clerk of the Court (By Hand Delivery)
All counsel as shown on the attached certificate

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

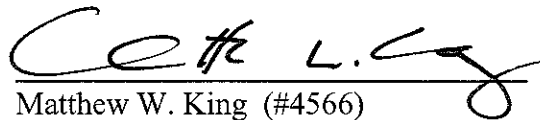
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 7, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing, and e-mailed and hand delivered to the following:

Richard D. Kirk
The Bayard Firm
222 Delaware Avenue, Suite 900
P.O. Box 25130
Wilmington, DE 19899

I hereby certify that on February 7, 2006, I sent the foregoing document by e-mail and federal express, next business day delivery, to the following non-registered participants:

Gaspare J. Bono
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